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24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO
COUNTERCLAIMS AND SECOND
AMENDED THIRD-PARTY CLAIMS
(SECOND REQUEST)**

1 Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of
2 Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Third-
3 Party Defendants, Christi El-Meligi and Netrishia Dalgai additional time, to and until January
4 11, 2023, to respond to “Defendant RDC’s Counterclaims And Second Amended Third-Party
5 Claims” filed by Razaghi Development Company, LLC (“RDC”) on November 29, 2022. ECF
6 No. 217.

7 In support of this Stipulation, the parties rely upon the following:

8 1. Ms. El-Meligi and Ms. Dalgai are no longer employed by Sage Memorial Hospital.
9 Accordingly, additional time has been required to contact them and discuss the allegations in
10 the Second Amended Third-Party Claims filing. Because of the holiday schedule and
11 competing commitments, additional time will be needed to properly review the allegations
12 being asserted by RDC with Ms. El-Meligi and Ms. Dalgai and respond to those allegations.

13 Counsel for both parties respectfully request the Court approve this Stipulation and
14 permit Third-Party Defendants, Ms. El-Meligi and Ms. Dalgai to respond to RDC’s November
15 29, 2022 filing on or before January 11, 2023.

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The parties respectfully request the Court approve this Stipulation.

/s/ Kris Leonhardt

/s/ Paul S. Padda

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Defendants*

Dated: December 30, 2022

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 30, 2022